

## REMARKS

Claims 1-37 are pending in the application and stand rejected. Applicant requests reconsideration of the claim rejections based on the above amendments and following remarks.

Claims 1-15 and 19-37 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,632,002 to Hashimoto and claims 16-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hashimoto in view of U.S. Patent No. 6,119, 147 to Toomey.

It is respectfully submitted that all pending claims are patentable over the cited art of record for at least the same reasons set forth in the previous Amendment filed on May 10, 2004. Applicant respectfully submits that Examiner is offering a strained interpretation and mischaracterization of the teachings of Hashimoto in an effort to meet the claimed inventions, without giving due consideration to the scope and context of the claimed inventions.

For instance, Applicant clearly explained in the previous response how Hashimoto fails to disclose or suggest a multi-modal shell for *managing and synchronizing information exchanges between the first and second mode processes of a multi-modal application to enable a synchronized multi-modal interaction with the application*, as recited in claim 1, and how Hashimoto does not disclose or suggest *receiving a command or event in the first modality; triggering (i) an action in the first modality and (ii) a corresponding action in the second modality, based on the received command or event; and updating application states or device states associated with the first modality and the second modality*, as recited in claims 19 and 29.

In the response to arguments section (page 11 of the Office Action), the Examiner cites Col. 49, lines 50-63 of Hashimoto as disclosing “*synchronizing information exchanges between processes ..*” However, the cited section has no relation to the claimed subject matter of

*managing and synchronizing information exchanges between the first and second mode processes of a multi-modal application to enable a synchronized multi-modal interaction with the application.*

In fact, Col. 49, lines 50-63 merely discloses a method that enables a mail document containing mixed data types (text and speech data) to be retrieved by carrying out the appropriate processing according to the data type, such as speech synthesis for text data and speech reproduction for speech data (Col. 49, lines 50-54). However, Examiner has failed to explain how this even remotely discloses *managing and synchronizing information exchanges between the first and second mode processes of a multi-modal application to enable a synchronized multi-modal interaction with the application*. In fact, the cited section merely discloses interaction with the mail document via an audio interface (speech synthesis output or speech reproduction). In any event, the cited section expressly discloses that the processing is carried out according to the data type - which is in stark contrast to a process that enables synchronized multi-modal interaction between the different mode processes. It appears that the Examiner simply fails to appreciate or understand the scope and context of the claimed inventions.

Further, with respect to the rejection of claim 16-18 based on the combination of Hashimoto and Toomey, such combination is believed to be legally deficient at least to the extent that Hashimoto does not disclose or suggest the inventions of claim 1, from which claims 16-18 depend. Furthermore, Toomey is distinguishable from the claimed inventions at least for the reasons previously cited by Applicant. Therefore, withdrawal of the rejection is respectfully requested.

Based on the above, the application is believed to be in condition for allowance. Early and favorable consideration by the Examiner is respectfully urged. Should the Examiner believe

that a telephone or personal interview may facilitate resolution of any remaining matters, it is requested that the Examiner contact Applicants' undersigned attorney.

Respectfully submitted,



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